Louisville & Jefferson County
Metropolitan Sewer District

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MSD

February 14, 1992

Mr. Derek Matory
Project Manager
United States Environmental Protection Agency
Superfund - North Remedial Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

RE: Lee's Lane Superfund Site, Jefferson County, Kentucky - Administrative Order on Consent, U.S. EPA Docket No. 91-32-C

Dear Mr. Matory:

With reference to our meeting on January 30, 1992, and subsequent telephone conversation, enclosed is the proposed MSD Monitoring Activities Schedule for the Lee's Lane Superfund Site, Jefferson County, Kentucky.

Please note that the proposed Monitoring Activities Schedule has been prepared on an FY quarterly basis commencing with the third FY quarter, January-March. The Monitoring Activities Schedule indicates generally those tasks which will be performed during the three (3) month period comprising the particular FY quarter indicated.

It may be possible to further detail task activities within each FY quarter by assigning it to a designated week from the 13 weeks in an FY quarter. However, it is my opinion that this amount of detail cannot be developed without having gone through at least two (2) successive FY quarters, or two (2) years, in order to establish a firm activity basis. I suggest that we explore this possibility at some later date when sufficient information is available upon which to make a reasonable and realistic decision.

As of this writing, I have not received a reply to either of the letters sent to Mr. Robert Stilts at Jefferson County, Public Properties Department. I will wait until early next week before contacting Mr. Stilts again relative to an orderly transfer of facilities and equipment.

I would appreciate your reviewing and providing me with any comments you may have concerning the attached Monitoring Activities Schedule. As I indicated, I would like to receive EPA's approved listing of third party laboratories which could be utilized to analyze samples taken at the Lee's Lane site. As I have previously indicated to you, our laboratory workload is such that we cannot analyze these additional samples until much later in 1992.

Please contact me at your convenience at (502) 540-6348 with your comments/approval of the enclosed Schedule.

Very truly yours,

C. A. Neumayer
Director of Operations & Maintenance

CAN/rdh
CAN28.2C

Enclosure

cc: G. R. Garner
File WD-2 (Lee's Lane-29)

MONITORING ACTIVITIES SCHEDULE

FY - 3RD QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
1	Site Inspection a. Gas Collection System b. Groundwater Monitoring Wells c. Gas Monitoring Wells d. Institutional Controls e. Area wide site conditions	Article 4.1	January	Report on general conditions observed; repair as required.
2	Air Quality Monitoring	Article 4.2	February	Real time monitoring, collect ambient samples; conduct sample analysis for ambient air and gas wells.
	a. Ambient Air Sampling	Task 3.1-1		
	1. Meteorological Monitoring	Task 3.1-2		
	(a) verify air sample locations (b) calibrate instruments (c) conduct analysis of samples			
	2. Real Time Monitoring	CGI		
	3. Number and location of ambient air sample	Figure 4.2-2		
	4. Ambient air sampling procedures and analysis	EPA Medhod TO-14; Appendix D & E		
	b. Gas Monitoring Well Sampling	Table 3.1-1 Table 3.1-2		
	1. Number and location of gas well samples	Figure 4.2-1 Appendix H		
	2. Gas well sampling procedures and analysis	PID/FID, CGI, EPA Method TO-14 Appendix D & E		

MONITORING ACTIVITIES SCHEDULE

FY - 3RD QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
3	Gas Collection System	Article 4.3	January, February, & March	Check physical conditions at each well head, blower houses and equipment. Service as required. Balance and adjust collection system quarterly. Report inoperative wells to KNREPC.
	A. Maintenance	Figure 4.3-1; Appendix F & J	January, February & March	
	B. Gas Collection system balancing	Appendix F, G, & J	January	
4	Groundwater Quality Monitoring	Article 4.4	February	
	a. Numer and location of groundwater samples	Figures 4.4-1 & 4.4-2		Collect samples for analyses
	b. Sampling frequency			Quarterly for 3 years and EPA to reevaluate frequency.
	c. Groundwater sampling procedures and analyses	Appendix B		
	1. Monitoring well purging and sample collection			
	2. Volatile organic compounds	Table 3.1-2, Appendix A & B		
	3. Inorganic analyses			
	4. Extractable organic analyses	Appendix A		
	5. Field measurements	pH, specific conductance and temperatures; Appendix B		

MONITORING ACTIVITIES SCHEDULE

FY - 3RD QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
5	River Bank Protection Controls	Artilce 4.5	March	
	A. Inspection			Observe evidence of distress or slope failure
	1. Rip-rap slopes	Figure 4.5-1 Table 4.A-1		Observe for signs of deterioration. On occurrence notify EPA and KNREPC.
	(a) Subsidence			
	(b) Erosion			
	(c) Damp areas			
	(d) Wet ground vegetation			
	(e) Soft spots in surface			
	(f) Seepage, water flow			
	(g) Sloughing/surface erosion			
	(h) Undermining of rip-rap			
	(i) Vegetation growth in rip-rap			
	(j) Building of debris			
	(k) Springs			
	(l) Piping			
	(m) Sand boils			
	2. Natural Slopes		March	Inspect for ground cracking.
	B. Surveying	Appendix K	Annually (FY - 4th Qtr)	Monitor for grounding movement of rip-rap or natural slopes.
	C. Rip-Rap Slope Maintenance		Annually (FY - 4th Qtr)	Spray for vegetation control.
6	Landfill, Surface and Cap Monitoring and Maintenance	Article 4.6 Appendix K	March	Observe area for signs of erosion, cracking or settlement. Repair as required.
	A. Mowing	Table 4.A-3	(FY - 4th, 1st, & 2nd QTR's)	

MONITORING ACTIVITIES SCHEDULE

FY - 3RD QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
7	Operations and Maintenance Reporting Requirements	Article 4.7 Appendix L	1st Month Following end of FY 3rd Qtr.	Prepare quarterly summary report of Operations and Maintenance Activities and submit to EPA and KNREPC.

MONITORING ACTIVITIES SCHEDULE

FY - 4TH QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
1	Site Inspection a. Gas Collection System b. Groundwater Monitoring Wells c. Gas Monitoring Wells d. Institutional Controls e. Area wide site conditions	Article 4.1	April	Report on general conditions observed; repair as required.
2	Air Quality Monitoring	Article 4.2	May	Real time monitoring, collect ambient samples; conduct sample analysis for ambient air and gas wells.
	a. Ambient Air Sampling	Task 3.1-1		
	1. Meteorological Monitoring	Task 3.1-2		
	(a) verify air sample locations (b) calibrate instruments (c) conduct analysis of samples			
	2. Real Time Monitoring	CGI		
	3. Number and location of ambient air sample	Figure 4.2-2		
	4. Ambient air sampling procedures and analysis	EPA Medhod TO-14; Appendix D & E		
	b. Gas Monitoring Well Sampling	Table 3.1-1 Table 3.1-2		
	1. Number and location of gas well samples	Figure 4.2-1 Appendix H		
	2. Gas well sampling procedures and analysis	PID/FID, CGI, EPA Method TO-14 Appendix D & E		

MONITORING ACTIVITIES SCHEDULE

FY - 4TH QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
3	Gas Collection System	Article 4.3	April, May, & June	Check physical conditions at each well head, blower houses and equipment. Service as required. Balance and adjust collection system quarterly. Report inoperative wells to KNREPC.
	A. Maintenance	Figure 4.3-1; Appendix F & J	April, May, & June	
	B. Gas Collection system balancing	Appendix F, G, & J	April	
4	Groundwater Quality Monitoring	Article 4.4	May	
	a. Numer and location of groundwater samples	Figures 4.4-1 & 4.4-2		Collect samples for analyses
	b. Sampling frequency			Quarterly for 3 years and EPA to reevaluate frequency.
	c. Groundwater sampling procedures and analyses	Appendix B		
	1. Monitoring well purging and sample collection			
	2. Volatile organic compounds	Table 3.1-2, Appendix A & B		
	3. Inorganic analyses			
	4. Extractable organic analyses	Appendix A		
	5. Field measurements	pH, specific conductance and temperatures; Appendix B		

MONITORING ACTIVITIES SCHEDULE

FY - 4TH QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
5	River Bank Protection Controls	Artilce 4.5	June	
	A. Inspection			Observe evidence of distress or slope failure
	1. Rip-rap slopes	Figure 4.5-1 Table 4.A-1		Observe for signs of deterioration. On occurrence notify EPA and KNREPC.
	(a) Subsidence			
	(b) Erosion			
	(c) Damp areas			
	(d) Wet ground vegetation			
	(e) Soft spots in surface			
	(f) Seepage, water flow			
	(g) Sloughing/surface erosion			
	(h) Undermining of rip-rap			
	(i) Vegetation growth in rip-rap			
	(j) Building of debris			
	(k) Springs			
	(l) Piping			
	(m) Sand boils			
	2. Natural Slopes		June	Inspect for ground cracking.
	B. Surveying	Appendix K	April	Monitor for grounding movement of rip-rap or natural slopes.
	C. Rip-Rap Slope Maintenance		Annually (FY - 4th Qtr)	Spray for vegetation control.
6	Landfill, Surface and Cap Monitoring and Maintenance	Article 4.6 Appendix K	March	Observe area for signs of erosion, cracking or settlement. Repair as required.
	A. Mowing	Table 4.A-3	April & May	

MONITORING ACTIVITIES SCHEDULE

FY - 4TH QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
7	Operations and Maintenance Reporting Requirements	Article 4.7 Appendix L	1st Month Following end of FY 4th Qtr.	Prepare quarterly summary report of Operations and Maintenance Activities and submit to EPA and KNREPC.

MONITORING ACTIVITIES SCHEDULE

FY - 1ST QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
1	Site Inspection a. Gas Collection System b. Groundwater Monitoring Wells c. Gas Monitoring Wells d. Institutional Controls e. Area wide site conditions	Article 4.1	July	Report on general conditions observed; repair as required.
2	Air Quality Monitoring	Article 4.2	August	Real time monitoring, collect ambient samples; conduct sample analysis for ambient air and gas wells.
	a. Ambient Air Sampling	Task 3.1-1		
	1. Meteorological Monitoring	Task 3.1-2		
	(a) verify air sample locations (b) calibrate instruments (c) conduct analysis of samples			
	2. Real Time Monitoring	CGI		
	3. Number and location of ambient air sample	Figure 4.2-2		
	4. Ambient air sampling procedures and analysis	EPA Medhod TO-14; Appendix D & E		
	b. Gas Monitoring Well Sampling	Table 3.1-1 Table 3.1-2		
	1. Number and location of gas well samples	Figure 4.2-1 Appendix H		
	2. Gas well sampling procedures and analysis	PID/FID, CGI, EPA Method TO-14 Appendix D & E		

MONITORING ACTIVITIES SCHEDULE

FY - 1ST QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
3	Gas Collection System	Article 4.3	July, August, & September	Check physical conditions at each well head, blower houses and equipment. Service as required. Balance and adjust collection system quarterly. Report inoperative wells to KNREPC.
	A. Maintenance	Figure 4.3-1; Appendix F & J	July, August, & September	
	B. Gas Collection system balancing	Appendix F, G, & J	July	
4	Groundwater Quality Monitoring	Article 4.4	August	
	a. Numer and location of groundwater samples	Figures 4.4-1 & 4.4-2		Collect samples for analyses
	b. Sampling frequency			Quarterly for 3 years and EPA to reevaluate frequency.
	c. Groundwater sampling procedures and analyses	Appendix B		
	1. Monitoring well purging and sample collection			
	2. Volatile organic compounds	Table 3.1-2, Appendix A & B		
	3. Inorganic analyses			
	4. Extractable organic analyses	Appendix A		
	5. Field measurements	pH, specific conductance and temperatures; Appendix B		

MONITORING ACTIVITIES SCHEDULE

FY - 1ST QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
5	River Bank Protection Controls	Artilce 4.5	July	
	A. Inspection			Observe evidence of distress or slope failure
	1. Rip-rap slopes	Figure 4.5-1 Table 4.A-1		Observe for signs of deterioration. On occurrence notify EPA and KNREPC.
	(a) Subsidence			
	(b) Erosion			
	(c) Damp areas			
	(d) Wet ground vegetation			
	(e) Soft spots in surface			
	(f) Seepage, water flow			
	(g) Sloughing/surface erosion			
	(h) Undermining of rip-rap			
	(i) Vegetation growth in rip-rap			
	(j) Building of debris			
	(k) Springs			
	(l) Piping			
	(m) Sand boils			
	2. Natural Slopes		July	Inspect for ground cracking.
	B. Surveying	Appendix K	Annually (FY - 4th Qtr)	Monitor for grounding movement of rip-rap or natural slopes.
	C. Rip-Rap Slope Maintenance		Annually (FY - 4th Qtr)	Spray for vegetation control.
6	Landfill, Surface and Cap Monitoring and Maintenance	Article 4.6 Appendix K	July	Observe area for signs of erosion, cracking or settlement. Repair as required.
	A. Mowing	Table 4.A-3	July	

MONITORING ACTIVITIES SCHEDULE

FY - 1ST QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
7	Operations and Maintenance Reporting Requirements	Article 4.7 Appendix L	1st Month Following end of FY 1st Qtr.	Prepare quarterly summary report of Operations and Maintenance Activities and submit to EPA and KNREPC.

MONITORING ACTIVITIES SCHEDULE

FY - 2ND QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
1	Site Inspection a. Gas Collection System b. Groundwater Monitoring Wells c. Gas Monitoring Wells d. Institutional Controls e. Area wide site conditions	Article 4.1	October	Report on general conditions observed; repair as required.
2	Air Quality Monitoring	Article 4.2	November	Real time monitoring, collect ambient samples; conduct sample analysis for ambient air and gas wells.
	a. Ambient Air Sampling	Task 3.1-1		
	1. Meteorological Monitoring	Task 3.1-2		
	(a) verify air sample locations (b) calibrate instruments (c) conduct analysis of samples			
	2. Real Time Monitoring	CGI		
	3. Number and location of ambient air sample	Figure 4.2-2		
	4. Ambient air sampling procedures and analysis	EPA Medhod TO-14; Appendix D & E		
	b. Gas Monitoring Well Sampling	Table 3.1-1 Table 3.1-2		
	1. Number and location of gas well samples	Figure 4.2-1 Appendix H		
	2. Gas well sampling procedures and analysis	PID/FID, CGI, EPA Method TO-14 Appendix D & E		

MONITORING ACTIVITIES SCHEDULE

FY - 2ND QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
3	Gas Collection System	Article 4.3	October, November, & December	Check physical conditions at each well head, blower houses and equipment. Service as required. Balance and adjust collection system quarterly. Report inoperative wells to KNREPC.
	A. Maintenance	Figure 4.3-1; Appendix F & J	October, November, & December	
	B. Gas Collection system balancing	Appendix F, G, & J	October	
4	Groundwater Quality Monitoring	Article 4.4	November	
	a. Numer and location of groundwater samples	Figures 4.4-1 & 4.4-2		Collect samples for analyses
	b. Sampling frequency			Quarterly for 3 years and EPA to reevaluate frequency.
	c. Groundwater sampling procedures and analyses	Appendix B		
	1. Monitoring well purging and sample collection			
	2. Volatile organic compounds	Table 3.1-2, Appendix A & B		
	3. Inorganic analyses			
	4. Extractable organic analyses	Appendix A		
	5. Field measurements	pH, specific conductance and temperatures; Appendix B		

MONITORING ACTIVITIES SCHEDULE

FY - 2ND QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
5	River Bank Protection Controls	Artilce 4.5	June	
	A. Inspection			Observe evidence of distress or slope failure
	1. Rip-rap slopes	Figure 4.5-1 Table 4.A-1		Observe for signs of deterioration. On occurrence notify EPA and KNREPC.
	(a) Subsidence			
	(b) Erosion			
	(c) Damp areas			
	(d) Wet ground vegetation			
	(e) Soft spots in surface			
	(f) Seepage, water flow			
	(g) Sloughing/surface erosion			
	(h) Undermining of rip-rap			
	(i) Vegetation growth in rip-rap			
	(j) Building of debris			
	(k) Springs			
	(l) Piping			
	(m) Sand boils			
	2. Natural Slopes		June	Inspect for ground cracking.
	B. Surveying	Appendix K	Annually (FY - 3rd Qtr)	Monitor for grounding movement of rip-rap or natural slopes.
	C. Rip-Rap Slope Maintenance		Annually (FY - 3rd Qtr)	Spray for vegetation control.
6	Landfill, Surface and Cap Monitoring and Maintenance	Article 4.6 Appendix K	March	Observe area for signs of erosion, cracking or settlement. Repair as required.
	A. Mowing	Table 4.A-3	September & November	

MONITORING ACTIVITIES SCHEDULE

FY - 2ND QUARTER

ITEM NUMBER	DESCRIPTION	ATTACHMENT I REFERENCE	MONITORING FREQUENCY	SCHEDULED ACTION
7	Operations and Maintenance Reporting Requirements	Article 4.7 Appendix L	1st Month Following end of FY 2nd Qtr.	Prepare quarterly summary report of Operations and Maintenance Activities and submit to EPA and KNREPC.